



**STILLINGER & GODINEZ**  
ATTORNEYS AT LAW, PLLC

**MARY STILLINGER**

*Licensed in Texas and New Mexico  
Board Certified in Criminal Law  
by the Texas Board of Legal Specialization*

**KATHERINE M. GODINEZ**

*Licensed in Texas and Arizona*

**BERNARD J. PANETTA**

*Licensed in Texas & District of Columbia  
Of Counsel*

August 10, 2023

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York, 10007

Re: *United States v. Lira*, 22-CR-151 (LGS)

Dear Judge Schofield:

As defense counsel for Eric Lira, I am writing to respectfully request that the Court continue the sentencing hearing and accompanying presentencing deadlines until mid-November 2023 and October 2023, respectively. I have consulted with the attorney for the United States, and the Government is in agreement with this modification to the dates previously set in the Scheduling Order (ECF Doc. No. 47), which were entered on May 8, 2023.

I am requesting this extension due to an irreconcilable scheduling conflict. I have a client who was served with a subpoena for the impeachment proceedings of Texas Attorney General Ken Paxton in the Texas Senate. That impeachment trial is scheduled to begin September 5, 2023, and I cannot be certain when my client would be called to testify. Due to my client's circumstances, I need to be present with her when she is called to testify.

This adjournment is not requested for the purpose of delay, but due to this scheduling conflict. The parties agree that the Speedy Trial Act, 18 U.S.C. §3161, *et seq.*, does not apply at this time, because Mr. Lira has already entered a plea of guilty. Therefore, the Court need not make any findings under the Speedy Trial Act.

Respectfully submitted,

  
Mary Stillinger  
STILLINGER & GODINEZ, PLLC

**EL PASO**  
401 Boston Ave., El Paso, TX 79902  
P: (915) 775-0705

**DALLAS**  
2619 Hibernia St., Dallas, TX 75204  
P: (214) 432-0405

stillingerlaw@sbcglobal.net  
www.stillingergodinez.com

cc: Sarah Mortazavi  
Benjamin Gianforti,  
Assistants United States Attorney  
(via ECF)